

## Project Summary

### I. INTRODUCTION

This source has applied for the renewal of its Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Bagcraft Corporation of America is a flexible packaging converter, and purchases a variety of papers, aluminum foils and plastic films, along with inks, adhesives (glues), and paraffin wax, and combines them into finished paper bags for a number of customers, primarily for use in food packaging. These bags are placed in corrugated cartons according to each customer's specifications, palletized, wrapped for shipping and delivered to the appropriate customers.

### II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
07	Paper Bag Manufacturing Line 7 with In-Line Flexographic Printing Unit	1972	None
12	Paper Bag Manufacturing Line 12 with In-Line Flexographic Printing Unit	1994	None
19	Paper Bag Manufacturing Line 19 with In-Line Flexographic Printing Unit	1978	None
20	Paper Bag Manufacturing Line 20 with In-Line Flexographic Printing Unit	1966	None
22	Paper Bag Manufacturing Line 22 with In-Line Flexographic Printing Unit	1971	None
65	Paper Bag Manufacturing Line 65 with In-Line Flexographic Printing Unit	1973	None
69	Paper Bag Manufacturing Line 69 with In-Line Flexographic Printing Unit	1987	None
86	Paper Bag Manufacturing Line 86 with In-Line Flexographic Printing Unit	1985	None
88	Paper Bag Manufacturing Line 88 with In-Line Flexographic Printing Unit	1954	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
100	Paper Bag Manufacturing Line 100 with In-Line Flexographic Printing Unit	1987	None
101	Paper Bag Manufacturing Line 101 with In-Line Flexographic Printing Unit	1978	None
112	Paper Bag Manufacturing Line 112 with In-Line Flexographic Printing Unit	1984	None
116	Paper Bag Manufacturing Line 116 with In-Line Flexographic Printing Unit	1986	None
118	Paper Bag Manufacturing Line 118 with In-Line Flexographic Printing Unit	1987	None
119	Paper Bag Manufacturing Line 119 with In-Line Flexographic Printing Unit	1987	None
120	Paper Bag Manufacturing Line 120 with In-Line Flexographic Printing Unit	1987	None
121	Paper Bag Manufacturing Line 121 with In-Line Flexographic Printing Unit	1988	None
124	Paper Bag Manufacturing Line 124 with In-Line Flexographic Printing Unit	1989	None
125	Paper Bag Manufacturing Line 125 with In-Line Flexographic Printing Unit	4/1992	None
126	Paper Bag Manufacturing Line 126 with In-Line Flexographic Printing Unit	4/1992	None
130	Paper Bag Manufacturing Line 130 with In-Line Flexographic Printing Unit	4/1992	None
131	Paper Bag Manufacturing Line 131 with In-Line Flexographic Printing Unit	4/1992	None
132	Paper Bag Manufacturing Line 132 with In-Line Flexographic Printing Unit	4/1992	None
133	Paper Bag Manufacturing Line 133 with In-Line Flexographic Printing Unit	4/1992	None
134	Paper Bag Manufacturing Line 134 with In-Line Flexographic Printing Unit	1963	None
135	Paper Bag Manufacturing Line 135 with In-Line Flexographic Printing Unit	2000	None
137	Paper Bag Manufacturing Line 137 with In-Line Flexographic Printing Unit	Prior to 1991	None
138	Paper Bag Manufacturing Line 138 with In-Line Flexographic Printing Unit	Prior to 1991	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
146	Paper Bag Manufacturing Line 146 with In-Line Flexographic Printing Unit	1995	None
170	Paper Bag Manufacturing Line 170 with In-Line Flexographic Printing Unit	2002	None
171	Paper Bag Manufacturing Line 171 with In-Line Flexographic Printing Unit	2002	None
191	Paper Bag Manufacturing Line 191 with In-Line Flexographic Printing Unit	1997	None
193	Paper Bag Manufacturing Line 193 with In-Line Flexographic Printing Unit	1999	None
194	Weber Printer	1998	None
BA	Annex Forced Air Boiler	1973	None
BP	Pacific Low Pressure Boiler	1973	None
BC	Cleaver Brooks Boiler	1973	None

### III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

#### Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	72.6
Sulfur Dioxide (SO <sub>2</sub> )	----
Particulate Matter (PM)	0.46
Nitrogen Oxides (NO <sub>x</sub> )	2.99
HAP, not included in VOM	----
Total	76.05

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

### CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

### Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions

was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

## VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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